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Partners For Justice Fellow: Stephen E. Mercer September 20, 2005

VIA EXPRESS MAIL

Ms. Beth O'Donnell, Executive Director Kentucky Public Service Commission P.O. Box 615 Frankfort, Kentucky 40602-0615 RECEWED

SEP 2 1 2005

PHACIC SERVICE COMMISSION

RE: In The Matter Of: DAMON SCOTT V. LOUISVILLE GAS AND ELECTRIC COMPANY, CASE NO. 2005-00134

Dear Ms. O'Donnell:

Enclosed for filing in the above captioned case are an original and ten (10) copies of Complainant's Motion for Extension of Time to Serve Initial Requests for Production of Documents and Written Interrogatories and for Adjustment of Procedural Schedule.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy and return it to me in the enclosed self-addressed stamped envelope.

Thank you for your assistance. Please contact me if you have any questions or need further information regarding this matter.

Very Truly Yours,

La Klist

Lisa Kilkelly

Attorney for Complainant

**Enclosures** 

cc: Parties of Record



## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

STACIVED)

In the Matter of:		The same
DAMON SCOTT	)	SEP 2 1 2005
COMPLAINANT	)	PLOCITION SERVICE
v.	) ) CA	SE NO. 2005-00134
LOUISVILLE GAS AND ELECTRIC COM	IPANY )	
DEFENDANT	)	

COMPLAINANT'S MOTION FOR EXTENSION OF TIME TO SERVE INITIAL REQUESTS FOR PRODUCTION OF DOCUMENTS AND WRITTEN INTERROGATORIES AND FOR ADJUSTMENT OF PROCEDURAL SCHEDULE

Complainant, by counsel, respectfully requests the Public Service Commission to grant an extension of time to serve initial requests for production of documents and written interrogatories on Defendant Louisville Gas and Electric Company.

By Order entered September 15, 2005, the Commission established a procedural schedule by which initial requests for production of documents and written interrogatories are to be served on or before September 23, 2005. Complainant's counsel of record in this case, Mary Cartwright, is no longer employed by the Legal Aid Society, and the complainant's case was transferred to another attorney, who is now leaving employment with the Legal Aid Society. The undersigned counsel did not receive a copy of the procedural schedule issued by the Commission until September 20, 2005. Due to previously scheduled commitments, counsel will need additional time beyond September 23 to become familiar with the case and prepare appropriate discovery requests.

Complainant requests an extension of time of no less than fourteen days in which to serve the initial discovery requests. Due to the shortness of the procedural schedule, an extension of time for serving initial requests for discovery will affect the other dates in the procedural schedule. Therefore, complainant requests also that all subsequent dates on the procedural schedule be similarly extended by no less than fourteen days.

WHEREFORE, complainant respectfully requests the Commission to grant this request for an extension of time of no less than fourteen days to serve initial requests for production of documents and written interrogatories and that the Commission make additional adjustments of no less than fourteen days to the subsequent dates in the procedural schedule.

Respectfully submitted,

Lisa Kilkelly

LEGAL AID SOCIETY, INC.

425 West Muhammad Ali Blvd.

Louisville, Kentucky 40202

(502) 584-1254

Attorney for Damon Scott

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Complainant's Motion for Extension of Time was served on the following persons on the 20<sup>th</sup> day of September, 2005.

Lisa Kilkelly

Attorney for Damon Scott

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